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16	David Lawee, Hiroshi Mikitani, Ann Miura-Ko, and Mary Agnes (Maggie) Wilderotter	
17	Additional Counsel on Signature Page	
18		
19	UNITED STATES DISTRICT COURT	
20	NORTHERN DISTRICT OF CALIFORNIA OAKLAND DIVISION	
21	UAKLAND	DIVISION
22	In re LYFT INC. SECURITIES LITIGATION	MASTER FILE NO. 4:19-CV-02690-HSG
23	This Document Relates to:	JOINT STIPULATION AND
24	ALL ACTIONS	ORDER TO EXTEND BRIEFING SCHEDULE ON LEAD PLAINTIFF'S
25		MOTION FOR LEAVE TO FILE [PROPOSED] SECOND AMENDED
26		CLASS ACTION COMPLAINT (as modified)
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Pursuant to Local Rules 6-2 and 7-12, Defendants Lyft, Inc., Logan Green, John Zimmer,			
Brian Roberts, Prashant (Sean) Aggarwal, Jonathan Christodoro, Ben Horowitz, Valerie Jarrett,			
David Lawee, Hiroshi Mikitani, Ann Miura-Ko, and Mary Agnes Wilderotter (the "Lyft			
Defendants") and Lead Plaintiff Rick Keiner (the "Plaintiff," and together with the Lyft			
Defendants, the "Parties"), through their counsel, submit the following Joint Stipulation and			
[Proposed] Order To Extend Briefing Schedule on Lead Plaintiff's Motion for Leave to File			
[Proposed] Second Amended Class Action Complaint (ECF No. 206).			
WHEREAS, on September 30, 2021, Lead Plaintiff Rick Keiner filed a Motion for Leave			
to File [Proposed] Second Amended Class Action Complaint (the "Motion" or "Motion for			
Leave") (ECF No. 206);			
WHEREAS, pursuant to the Court's Scheduling Notes in effect when the Motion was			
filed, the hearing on the Motion was set for February 3, 2022;			
WHEREAS, on October 14, 2021, pursuant to the Parties' stipulation, the Court extended			
Defendants' deadline to respond to the Motion until November 30, 2021, and Plaintiffs' deadline			
to reply to the Motion until January 7, 2022;			
WHEREAS, the Parties have met and conferred and agree to extend the date for the filing			
of the Opposition from November 30, 2021, to December 20, 2021, and the date for the filing of			
the Reply from January 7, 2022, to January 18, 2022;			
WHEREAS, modest extensions of the deadlines for the Opposition and the Reply will			
permit the parties to continue meeting their concurrent discovery obligations efficiently, while			
making mutual reasonable accommodations in light of the upcoming holidays.			
WHEREAS, there will still be ample time for the Court to consider the Opposition and			
Reply prior to the February 3, 2022, hearing on the Motion, and this extension of time will not			
alter the date of any event or deadline already fixed by Court order;			
NOW, THEREFORE, pursuant to Civil Local Rule 6-2, the Parties hereby stipulate,			
subject to Court approval, that the briefing schedule for the Motion for Leave will be modified as			
follows:			

1	1. The Lyft Defendants shall fi	le their Opposition to the Motion for Leave by
2	December 20, 2021; and	
3	2. Plaintiff shall file a Reply in	support of his Motion for Leave by January 18,
4	2021.	
5		
6	Dated: November 17, 2021	
7	Stipulated and agreed to by:	
8		
9	BLOCK & LEVITON LLP	LATHAM & WATKINS LLP
10	/s/ Jeffrey C. Block Jeffrey C. Block (admitted pro hac vice)	/s/ Colleen C. Smith Colleen C. Smith (CA Bar No. 231216) 12670 High Bluff Drive
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23		Attorneys for Lyft Defendants Lyft, Inc., Logan Green, John Zimmer, Brian Roberts,
2425		Prashant (Sean) Aggarwal, Ben Horowitz, Valerie Jarrett, David Lawee, Hiroshi Mikitani, Ann Miura-Ko, and Mary Agnes
26		(Maggie) Wilderotter
27		
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1	FILER'S ATTESTATION	
2	Pursuant to Civil L. R. 5-1(h)(3), regarding signatures, I hereby attest that concurrence in	
3	the filing of the document has been obtained from all of the signatories above.	
5		
6	Dated: November 17, 2021 /s/ Colleen C. Smith Colleen C. Smith	
7	* *	
8	PURSUANT TO STIPULATION, IT IS SO ORDERED except the Plaintiff shall file a	
9	Reply in support of his Motion for Leave by January 18, 2022.	
11	Date: 11/18/2021 HONORABLE HAYWOOD S. GILLIAM, JR.	
12	U.S. DISTRICT JUDGE	
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